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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE UBER TECHNOLOGIES, INC.
 PASSENGER SEXUAL ASSAULT
 LITIGATION

This Document Relates To:

WHB 823 v. Uber Technologies, Inc., et al.,
 Case No. 24-cv-4900;
A.R.2 v. Uber Technologies, Inc., et al.,
 Case No. 24-cv-7821;
B.L. v. Uber Technologies, Inc., et al.,
 Case No. 24-cv-7940;
Dean v. Uber Technologies, Inc., et al., Case
 No. 23-cv-6708;
LCHB128 v. Uber Technologies, Inc., et al.,
 Case No. 24-cv-7019; and

Case No. 3:23-md-03084-CRB (LJC)

STIPULATION AND [PROPOSED] ORDER
 TO RESET DEADLINES RE PTO NO. 26

Judge: Hon. Charles R. Breyer
 Courtroom: Courtroom 6 – 17th Floor

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1 WHEREAS, on May 1, 2025, the Court issued Pretrial Order No. 26: Bellwether Trial Wave 1
2 Case Assignments and Discovery Schedule;

3 WHEREAS, Pretrial Order No. 26 required the parties to exchange expert reports by August 8,
4 2025 and rebuttal expert reports by September 8, 2025;

5 WHEREAS, on July 8, 2025, the Court issued Pretrial Order No. 28: Order on Defendants' Motion
6 to Dismiss Plaintiffs' Bellwether Complaints. Pursuant to the Federal Rules of Civil Procedure,
7 Defendants' Answers to the Bellwether Complaints are due July 22, 2025.

8 WHEREAS, the parties agree to set dates for Defendants' Answers, such that Defendants will
9 answer all Wave 1 Plaintiffs' Short-Form Complaints and the Master Long-Form Complaint on August
10 5, 2025, and will answer the remaining Bellwether Complaints on August 19, 2025.

11 WHEREAS, the parties agree that fact discovery that remains to be completed requires extending
12 the deadlines for expert discovery.

13 WHEREAS, the parties agree that the Expert Deadlines as set out at PTO 26 Paragraph be modified
14 such that the exchange of expert reports will move from August 8 to August 22. The exchange of rebuttal
15 expert reports will move from September 8 to 22.

16 WHEREAS, the parties agree that the close of discovery, as set out at PTO 26 Paragraph c will
17 move from September 22, 2025 to October 6, 2025.

18 WHEREAS, the parties agree that extending the aforementioned deadlines will not require
19 extending any other deadlines set by Pretrial Order No. 26.

20 THEREFORE, the parties respectfully request the Court enter the parties' stipulation that
21 Defendants provide answers on the dates set out above, and that the following deadlines set by Pretrial
22 Order No. 26 be extended as follows:

- 23 • The parties shall exchange expert reports by August 22, 2025.
- 24 • The parties shall exchange expert rebuttal reports by September 22, 2025.
- 25 • The close of discovery will be October 6, 2025.

26
27 **IT IS SO STIPULATED.**
28

1 DATED: July 17, 2025

KIRKLAND & ELLIS LLP

2
3 /s/ Laura Vartain Horn

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16 DATED: July 17, 2025

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17 /s/ Andrew R. Kaufman

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ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

DATED: July 17, 2025

/s/ Laura Vartain Horn
Laura Vartain Horn

[PROPOSED] ORDER

IT IS SO ORDERED.

Dated: _____

Honorable Charles R. Breyer
United States District Judge